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7 UNITED STATES DISTRICT COURT

8 EASTERN DISTRICT OF CALIFORNIA

9 CHELSEA ROSE SEXSON,
10 Plaintiff,
11 vs.
12 COMMISSIONER OF SOCIAL SECURITY,
13 Defendant

CASE NO.: 2:25-cv-01800-SCR

STIPULATION FOR THE AWARD AND
PAYMENT OF ATTORNEY FEES AND
EXPENSES PURSUANT TO THE EQUAL
ACCESS TO JUSTICE ACT; ORDER

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16 The parties, through their respective counsel, hereby agree that attorney fees in the
17 amount of \$9,900 shall be awarded to Plaintiff pursuant to the Equal Access to Justice Act
18 (EAJA), 28 U.S.C. § 2412, and costs of \$0, pursuant to 28 U.S.C. § 1920. Such attorney fees
19 shall be subject to verification that Plaintiff has no debt that qualifies for offset, pursuant to the
20 Treasury Offset Program as discussed in *Astrue v. Ratliff*, 130 S. Ct. 2521 (2010).

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22 If the U.S. Department of the Treasury determines that Plaintiff's EAJA fees are not
23 subject to any offset allowed under the Department of the Treasury's Offset Program, then the
24 check or electronic funds transfer for EAJA fees shall be made payable to Plaintiff's attorney,
25 Margaret Lehrkind, based upon Plaintiff's assignment of these amounts to her. *See Exhibit -*

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27 STIPULATION FOR THE AWARD AND PAYMENT OF ATTORNEY FEES AND
EXPENSES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT; ORDER - 1

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1 Retainer Agreement. If Plaintiff has a debt, then any remaining funds after offset shall be made
2 payable to Plaintiff and mailed to counsel's address.

3 This stipulation constitutes a compromise settlement of Plaintiff's request for EAJA
4 attorney fees and expenses and does not constitute an admission of liability on the part of
5 Defendant under the EAJA. Payment of the agreed amount shall constitute a complete release
6 from, and bar to, any and all claims that Plaintiff and/or Plaintiff's counsel may have relating to
7 EAJA attorney fees and expenses in connection with this action.

8 This award is without prejudice to the rights of Plaintiff's counsel to seek Social Security
9 Act attorney fees under 42 U.S.C. § 406, subject to the offset provisions of the EAJA.
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11
12 DATE: November 3, 2025 Respectfully submitted,

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15 Lehrkind Law Office, P.C.

16 By: /s/ Margaret Lehrkind
17 MARGARET LEHRKIND
18 Attorney for Plaintiff

19 DATE: November 3, 2025 By: /s/ Katherine Bennett Watson *
20 KATHERINE BENNETT WATSON
21 *As authorized via email on 10/31/25
Special Assistant United States Attorney
Attorney for Defendant

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27 STIPULATION FOR THE AWARD AND PAYMENT OF ATTORNEY FEES AND
28 EXPENSES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT; ORDER - 2

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2 **[PROPOSED] ORDER**
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4 Based upon the parties' Stipulation for the Award and Payment of Equal Access to
5 Justice Act Fees and Expenses (the "Stipulation"),
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7 **IT IS ORDERED** that fees and expenses in the amount of NINE THOUSAND NINE
8 HUNDRED (\$9,900) as authorized by the Equal Access to Justice Act (EAJA), 28 U.S.C. §
9 2412(d), and ZERO dollars (\$0.00), pursuant to 28 U.S.C. § 1920 be awarded subject to the
10 terms of the Stipulation.

11 IT IS SO ORDERED.
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13 DATE: November 17, 2025

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15 SEAN C. RIORDAN
16 UNITED STATES MAGISTRATE JUDGE
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STIPULATION FOR THE AWARD AND PAYMENT OF ATTORNEY FEES AND
EXPENSES PURSUANT TO THE EQUAL ACCESS TO JUSTICE ACT; ORDER - 3